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17 *Attorneys for Defendants Bristol-Myers Squibb Company,*  
18 *Sanofi-Aventis U.S. LLC, Sanofi US Services Inc.,*  
19 *and Sanofi-Synthelabo Inc.*

20 [Additional Counsel Listed At Signature Page]

21 UNITED STATES DISTRICT COURT  
22 NORTHERN DISTRICT OF CALIFORNIA  
23 SAN FRANCISCO DIVISION

24 JOSEPH TERRY *et al.*,

25 Plaintiff,

26 v.

27 BRISTOL-MYERS SQUIBB COMPANY,  
28 SANOFI-AVENTIS U.S. LLC., SANOFI-  
AVENTIS U.S., INC., SANOFI-  
SYNTHELABO, INC., MCKESSON  
CORPORATION, and DOES 1 to 100,

Defendants.

No. 14-2656 JSW

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER TO STAY  
LITIGATION PENDING TRANSFER TO  
THE PLAVIX® MDL**

Judge: Hon. Jeffrey S. White

1 This Joint Stipulation is made by and between Plaintiffs in *Terry et al. v. Bristol-Myers*  
 2 *Squibb Co. et al.*, No. CV-14-2655 JSW (N.D. Cal.), and Defendants Bristol-Myers Squibb  
 3 Company, Sanofi-Aventis U.S. LLC, Sanofi US Services Inc., and Sanofi-Synthelabo Inc.,<sup>1</sup>  
 4 (collectively “Defendants”), by and through the undersigned counsel of record, with reference to the  
 5 following facts:

6 1. WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation  
 7 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to  
 8 Judge Freda Wolfson;

9 2. WHEREAS, on June 6, 2014, Plaintiffs filed the *Terry* action in the Superior Court  
 10 of California, San Francisco County;

11 3. WHEREAS, on June 9, 2014, the *Terry* action was removed to this Court by  
 12 Defendants;

13 4. WHEREAS, on June 11, 2014, Defendants tagged this case for transfer to the  
 14 Plavix® MDL and anticipates that the JPML will finalize a conditional transfer order for this case  
 15 soon; and

16 5. WHEREAS, the Parties agree that the *Terry* action should be stayed pending its  
 17 anticipated transfer to the Plavix® MDL in the District of New Jersey.

18  
 19 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s  
 20 approval, that the *Terry* action should be stayed pending its anticipated transfer to the Plavix® MDL  
 21 in the District of New Jersey.

22  
 23 **IT IS SO STIPULATED.**  
 24  
 25

26  
 27 <sup>1</sup> Sanofi-Aventis U.S. LLC was incorrectly designated as “Sanofi-Aventis U.S. LLC,” Sanofi-  
 28 Aventis U.S. Inc. was incorrectly designated as “Sanofi-Aventis U.S., Inc.,” and Sanofi-Synthelabo  
 Inc. was incorrectly designated as “Sanofi-Synthelabo, Inc.” in the Complaint. As of June 11, 2012,  
 Sanofi-Aventis U.S. Inc. changed its name to Sanofi US Services Inc.

1 Dated: June 20, 2014

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San Francisco, CA 94105

4 Michael Miller  
Jeffrey A. Travers  
5 THE MILLER FIRM, LLC  
108 Railroad Avenue  
6 Orange, VA 22960

7  
8 By: /s/ Joshua C. Ezrin  
Joshua C. Ezrin

9 *Attorney for Plaintiffs*

10  
11 Dated: June 20, 2014

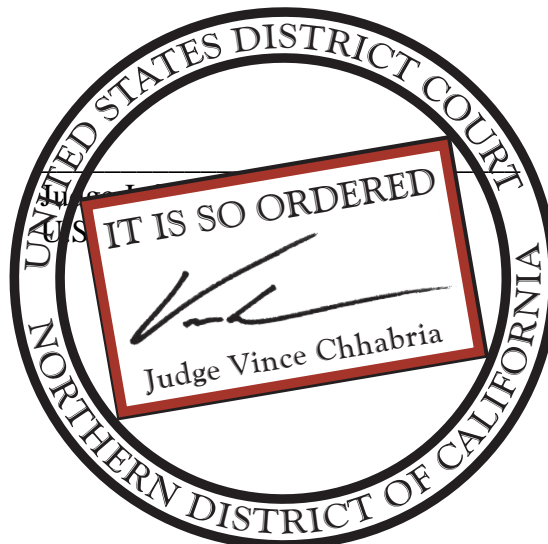
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14 By: /s/ Sharon D. Mayo  
15 Sharon D. Mayo

16 *Attorneys for Defendants Bristol-Myers Squibb*  
17 *Company, Sanofi-Aventis U.S. LLC, Sanofi US*  
18 *Services Inc., and Sanofi-Synthelabo Inc.*

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20  
21  
22 Date: June 24, 2014



1 I, Sharon D. Mayo, am the ECF User whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order to Stay Litigation Pending Transfer to the Plavix® MDL. In  
3 compliance with General Order 45, X.B, I hereby attest that Joshua C. Ezrin has concurred in this  
4 filing.

5  
6 Dated: June 20, 2014

ARNOLD & PORTER LLP

7  
8 By: /s/ Sharon D. Mayo

9 Sharon D. Mayo

10 *Attorneys for Defendants Bristol-Myers Squibb*  
11 *Company, Sanofi-Aventis U.S. LLC, Sanofi US*  
12 *Services Inc., and Sanofi-Synthelabo Inc.*  
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